

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

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**THE STATE OF NEVADA**

Electronically Filed  
Jun 30 2021 10:34 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

Appellant,

vs.

**TARIQ MANSON**

Respondent.

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**Docket No. 82038**

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Direct Appeal From an Amended Decision and Order Dismissing Case  
Eighth Judicial District Court  
The Honorable Linda Bell, District Judge and  
District Court No. C-18-335833-1

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**MOTION FOR EXTENSION OF TIME  
TO FILE ANSWERING BRIEF (SECOND REQUEST)**

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JoNell Thomas  
State Bar #4771  
Special Public Defender  
Melinda E. Simpkins  
State Bar #7911  
Chief Deputy Special Public Defender  
Daniel R. Page  
State Bar #10706  
Chief Deputy Special Public Defender  
330 South Third Street, #800  
Las Vegas, NV 89155  
(702) 455-6265  
Attorneys for Tariq Manson

COMES NOW, Appellant Tariq Manson, by and through his attorneys, JoNell Thomas, Special Public Defender, Melinda E. Simpkins, Chief Deputy Special Public Defender, and Daniel Page, Chief Deputy Special Public Defender, and requests this Honorable Court to grant an extension of time of 30 days, up to and including August 5, 2021, to file the Answering Brief in this matter.

### **STATEMENT OF THE CASE**

Respondent's first request for a 30-day extension was granted and the Answering Brief is due July 6, 2021.

Based on the reasons set forth in the Declaration of Counsel attached hereto, Mr. Manson is requesting 30 days to file his Answering Brief. This is his second Motion for an Extension.

### **POINTS AND AUTHORITIES**

NRAP 31(b)(3)(B) sets forth in pertinent part:

A motion for extension of time for filing a brief may be made no later than the due date for the brief.....

(B) ...The court will grant an initial motion for extension of time for filing a brief only upon a clear showing of good cause. The court shall not grant additional extensions of time except upon a showing of extraordinary circumstances and extreme need.

## **CONCLUSION**

Mr. Manson moves this Court for a 30-day extension of time to file his Answering Brief, up to and including August 5, 2021.

Dated this 30<sup>th</sup> day of June, 2021.

SUBMITTED BY:.

/s/ MELINDA SIMPKINS

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JoNell Thomas  
State Bar #4771  
Special Public Defender  
Melinda E. Simpkins  
State Bar #7911  
Chief Deputy Special Public Defender  
Daniel R. Page  
State Bar #10706  
Chief Deputy Special Public Defender  
330 South Third Street, #800  
Las Vegas, NV 89155  
(702) 455-6265  
Attorneys for Tariq Manson

## **DECLARATION OF MELINDA SIMPKINS**

MELINDA SIMPKINS, hereby declares as follows:

1. That I am an attorney duly licensed to practice law in the State of Nevada, and the attorney with the Clark County Special Public Defender's office assigned to represent Mr. Manson on his direct appeal.

2. I was not the trial attorney in this case.

3. The Answering Brief is due July 6, 2021.

4. I have been diligently working on the Answering Brief, however, this is a critically important issue of a complex nature involving psychological reports and medically technical information and terminology. As a result, additional research is required which I will be unable to complete by the time the Answering Brief is due on July 6, 2021.

5. Although this is the second request for an extension of time to file the Respondent's Answering Brief, I only initially requested thirty days. The State's initial request for an extension of time was sixty days and I, therefore, request an additional thirty days in order to complete the Answering Brief, up to and including August 5, 2021.

...

I declare that I make this request in good faith and not for purposes of delay.

Dated: June 30, 2021.

/s/ MELINDA SIMPKINS

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MELINDA SIMPKINS

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that on June 30, 2021, a copy of the foregoing Motion for Extension of Time to File Answering Brief (Second Request) was served as follows:

**BY ELECTRONIC FILING TO**

District Attorney's Office  
200 Lewis Ave., 3<sup>rd</sup> Floor  
Las Vegas, NV 89155

Nevada Attorney General  
100 N. Carson St.  
Carson City NV 89701

/s/ MELINDA SIMPKINS

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MELINDA SIMPKINS